

NOW COMMUNICATIONS, INC.

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Federal Communications Commission
Commissioner Michael Copps
445 12th Street, S.W.
Washington, D.C. 20554

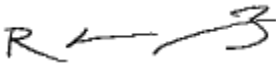
Dear Commissioner Copps:

On behalf of NOW Communications, Inc. ("NOW"), I am writing to ask your support for the plan submitted by the Association of Communications Enterprises (ASCENT) on December 4th as part of the Commission's Triennial Review (WC Docket Nos. 96-98, 01-338). The ASCENT Plan represents a sound approach to protecting the UNE-Platform and generating true local phone competition. NOW urges you to adopt it.

A decision by the Federal Communications Commission to eliminate the UNE-Platform is certain to disrupt the ability of competitive carriers (including my company) to continue to provision service to consumers. Of particular concern is the ability of competitive carriers to purchase wholesale switching as a UNE.

It is neither possible nor economically feasible for competitive carriers (including NOW) to self-provision local switching services at this time. Clearly local switching is necessary to provide telephone services. Were the FCC to forebear from requiring the Bell Operating Companies to provision switching services as a UNE, competitive carriers would be unable to obtain reliable substitute switching services at reasonable rates. That would therefore impair the ability of competitive carriers, especially small residential ones such as NOW, to operate.

The ASCENT plan would give competitive carriers continued access to the UNE-Platform while the FCC and state commissions evaluate the local switching markets (preferably utilizing the five factors described in the ASCENT plan), preserve the ability of competitive carriers to offer local dial tone, and create real consumer choice among service providers. It also would encourage network deployment and give the states a critical role in overseeing local phone services. Again, we urge you to adopt the ASCENT plan.



R. Scott Seab